

DELBELLO DONNELLAN WEINGARTEN WISE & WIEDERKEHR LLP
Charles L. Rosenzweig, Esq. (CR 7622)
Attorneys for Petitioner/Judgment Creditor
One North Lexington Ave., 11th floor
White Plains, New York 10601
(914) 681-0200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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H&H METALS CORP.,
PETITIONER/JUDGMENT CREDITOR,

MISC. CASE NO. 20-390

VS

GULSHAN KHANCHAND PANJWANI
AND MONA PANJWANI,

RESPONDENTS/JUDGMENT DEBTOR.

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**NOTICE OF MOTION TO
COMPEL SUBPOENA
RESPONSES**

PLEASE TAKE NOTICE that upon the attached Declaration of Charles L. Rosenzweig, Esq., dated November 13, 2020, and the memorandum of law submitted in support of this motion, petitioner/judgment creditor H&H Metals Corp. (“H&H”) will move the Court at 500 Pearl Street, New York, N.Y. 10007, on December 7, 2020, at 10:00am, or as soon thereafter as counsel can be heard for an order pursuant to Fed. R. Civ. P. 37 (i) compelling respondent/judgment debtor, Gulshan Khanchand Panjwani (“Panjwani”), to comply with H&H’s Subpoena to Testify at a Deposition and to Produce Documents, dated March 3, 2020 and (ii) compelling respondent, Mona Panjwanito (“Mona”) to produce documents in accord with H&H’s Subpoena to Produce Documents, dated March 5, 2020, and for an order pursuant to Fed.R.Civ.P. 45(g) to hold Panjwani and Mona in contempt for failing without adequate excuse to obey the respective subpoenas served on them, and for such other and further relief as this Court may deem proper and just.

Dated: White Plains, New York
November 17, 2020

DELBELLO DONNELLAN WEINGARTEN WISE &
WIEDERKEHR, LLP

By: /Charles L. Rosenzweig/

Charles L. Rosenzweig, Esq. (CR 7622)

Attorneys for Petitioner/Judgment

Creditor, H&H Metals Corp.

One North Lexington Ave.

White Plains, NY 10601

Tel: (914) 681-0200

TO: Mr. Gulshan Khanchand Panjwani
2 Second Street, Unit C101
Jersey City, N.J 07302

Mrs. Mona Panjwani
2 Second Street, Unit C101
Jersey City, N.J 07302